

FILED

APR 23 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RODNEY TYLER and
SCHARVON MAHONE a/k/a
Scharvon Mahoney,

Defendants.

No.

4:15CR00193 RLW/JMB

INDICTMENT

COUNT 1

The Grand Jury charges that:

INTRODUCTION

1. At all times relevant to this Indictment, Defendant RODNEY TYLER resided in Illinois.
2. At all times relevant to this Indictment, Defendant SCHARVON MAHONE resided in Illinois.
3. At all times relevant to this Indictment, Bank of America and JP Morgan Chase Bank were federally insured financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation.
4. A “means of identification” is any name or number that may be used alone, or in conjunction with any other information, to identify a specific individual, including a name, Social Security number, driver’s license number, or a date of birth.

5. Between on or about 2013 and March of 2014, M.A.'s means of identification, including her credit cards, bank debit cards, and/or Social Security card, as well as her New York driver's license, were stolen.

6. Between on or about 2013 and May of 2014, G.H.'s means of identification, including her credit cards, bank debit cards, and/or Social Security card, as well as her Florida driver's license, were stolen.

7. Between on or about January 1, 2014 and October of 2014, A.L.'s means of identification, including her credit cards, bank debit cards, and/or Social Security card, as well as her Illinois driver's license, were stolen.

8. Between on or about January 1, 2014 and October of 2014, N.H.'s means of identification, including her credit cards, bank debit cards, and/or Social Security card, as well as her California driver's license, were stolen.

9. Between on or about 2011 and October of 2014, K.S.'s, a/k/a K.N.'s, means of identification, including her credit cards, bank debit cards, and/or Social Security card, as well as her Washington, D.C. driver's license, were stolen.

10. Between on or about 2011 and October of 2014, J.W.'s means of identification, including her credit cards, bank debit cards, and/or Social Security card, as well as her Kentucky driver's license, were stolen.

11. Between on or about 2011 and October of 2014, A.S.'s means of identification, including his credit cards, bank debit cards, and/or Social Security card, as well as his Texas driver's license, were stolen.

12. Between on or about 2011 and October of 2014, R.L.'s means of identification, including his credit cards, bank debit cards, and/or Social Security card, as well as his California driver's license, were stolen.

13. Between on or about August 1, 2014 and August 28, 2014, H.T.'s means of identification, including her credit cards, bank debit cards, and/or Social Security card, as well as her Illinois driver's license, were stolen.

THE SCHEME AND CONSPIRACY

14. Beginning in or about sometime prior to April 1, 2014, with the exact date being unknown to the Grand Jury, and continuing until on or about October 8, 2014, in the Eastern District of Missouri and elsewhere,

RODNEY TYLER and SCHARVON MAHONE a/k/a Scharvon Mahoney,

the defendants herein, and other persons known and unknown to the Grand Jury, devised a scheme and artifice to defraud financial institutions, including Bank of America and JP Morgan Chase Bank, and to obtain money and property owned by and under the custody and control of financial institutions by means of false and fraudulent pretenses, representations, and promises described herein.

15. Beginning on or about sometime prior to April 1, 2014, with the exact date unknown to the Grand Jury, and continuing until on or about October 8, 2014, in the Eastern District of Missouri and elsewhere,

**RODNEY TYLER and
SCHARVON MAHONE a/k/a Scharvon Mahoney,**

the defendants herein, and other persons known and unknown to the Grand Jury, did knowingly and willfully conspire, combine, confederate, and agree together and with others to commit bank fraud.

MANNER AND MEANS OF THE SCHEME AND CONSPIRACY

16. The manner and means of the scheme and conspiracy are further described as follows:

a. It was part of the scheme and conspiracy that **RODNEY TYLER, SCHARVON MAHONE**, and others, would obtain the means of identification of individuals by possessing, using and transferring stolen credit cards, bank debit cards and state issued driver's licenses of those individuals.

b. It was further part of the scheme and conspiracy that illegitimate and fraudulent driver's licenses were created utilizing the means of identification of the same individual.

c. It was further part of the scheme and conspiracy that the illegitimate and fraudulent driver's licenses were possessed, used, and transferred, and the means of identification contained therein, in order to negotiate and make unauthorized withdrawals of funds from personal bank accounts at financial institutions insured by the Federal Deposit Insurance Corporation including, but not limited to, Bank of America and JP Morgan Chase Bank.

d. It was further part of the scheme and conspiracy that the defendants and co-conspirators would travel in and outside the Eastern District of Missouri with illegitimate and fraudulent driver's licenses, as well as the stolen means of identification, including the stolen

credit cards, bank debit cards and legitimate state issued driver's licenses of those individuals, and then proceed to banks, including bank branches of the Bank of America and JP Morgan Chase Bank, where those individuals had and maintained personal bank accounts.

e. It was further part of the scheme and conspiracy that **RODNEY TYLER** and a co-conspirator, such as **SCHARVON MAHONE**, would, in order to withdraw funds from individual bank accounts, negotiate counter withdrawals and represent to the banks, including Bank of America and JP Morgan Chase Bank, that a co-conspirator, such as **SCHARVON MAHONE**, was the named account holder on a specific bank account and authorized to withdraw funds from said account, and, as part of the fraudulent transaction, present, without authority to do so, one or more means of identification of another person. Such fraudulent transactions typically involved the use of an illegitimate and fraudulent driver's license and often other means of identification.

ACTS IN FURTHERANCE OF THE SCHEME AND CONSPIRACY

17. In furtherance of the scheme, and to execute the scheme and accomplish the objectives of the conspiracy, in the Eastern District of Missouri and elsewhere,

a. On or about April 1, 2014, **RODNEY TYLER** and another individual presented means of identification specific to M.A. to a bank teller at the Park Ridge, Illinois branch of Bank of America and thereby made two unauthorized withdrawals in the amount of \$2,506.00 and \$3,542.00 from a Bank of America account in the name of M.A., account number xxxx2392.

b. On or about May 23, 2014, **RODNEY TYLER** and another individual presented means of identification specific to G.H. to a bank teller at a Clayton, Missouri branch

of Bank of America and thereby made two unauthorized withdrawals in the amount of \$2,263.00 and \$1,740.00 from a Bank of America account in the name of G.H, account number xxxx6240.

c. On or about May 27, 2014, **RODNEY TYLER** and another individual presented means of identification specific to G.H. to a bank teller at a Clayton, Missouri branch of Bank of America and thereby made two unauthorized withdrawals in the amount of \$2,647.00 and \$1,872.00 from a Bank of America account in the name of G.H, account number xxxx6240.

d On or about August 28, 2014, **RODNEY TYLER** and another individual presented means of identification specific to H.T. to a bank teller at an Indianapolis, Indiana branch of JP Morgan Chase Bank and thereby made an unauthorized withdrawal in the amount of \$1,800.00 from a JP Morgan Chase Bank account in the name of H.T., account number xxxx8289.

e. On or about October 8, 2014, **RODNEY TYLER, SCHARVON MAHONE**, and other persons known and unknown to the Grand Jury, traveled from Illinois to Troy, Missouri and were in the possession of means of identifications specific to multiple individuals from around the country including, but not limited to,

i. the Illinois issued driver's license of A.L., along with a Bank of America debit card in her name, and an illegitimate and fraudulent driver's license containing means of identification specific to A.L. but not bearing the photograph of A.L.

ii. the California issued driver's license of N.H., along with a Chase Bank debit card in her name and one or more credit cards in her name, and an illegitimate and fraudulent driver's license containing means of identification specific to N.H. but not bearing the photograph of N.H.

iii. the Washington, D.C. issued driver's license of K.S., a/k/a K.N., along with a Bank of America debit card in her name, and an illegitimate and fraudulent driver's license containing means of identification specific to K.S., a/k/a K.N., but not bearing the photograph of K.S., a/k/a K.N.

iv. the Kentucky issued driver's license of J.W., along with a Farmers National Bank debit card in her name, a Social Security Card in her name, and one or more credit cards in her name, and an illegitimate and fraudulent driver's license containing means of identification specific to J.W. but not bearing the photograph of J.W.

v. the Texas issued driver's license of A.S., along with a Bank of America debit card in his name and one or more credit cards in his name, and an illegitimate and fraudulent driver's license containing means of identification specific to A.S. but bearing the photograph of **RODNEY TYLER** and another illegitimate and fraudulent driver's license containing the means of identification of A.S. but not bearing the photograph of A.S.

vi. the California issued driver's license of R.L., along with a Bank of America debit card in his name and one or more credit cards in his name, and an illegitimate and fraudulent driver's license containing means of identification specific to R.L. but not bearing the photograph of R.L.

f. On or about October 8, 2014, **RODNEY TYLER** and **SCHARVON MAHONE** presented, without authority to do so, means of identification specific to A.L. to a bank teller at a Troy, Missouri branch of Bank of America in the Eastern District of Missouri and thereby: negotiated and made an unauthorized withdrawal in the amount of \$2,715.00 from a Bank of America savings account in the name of A.L., account number xxxx7716; negotiated

and made an unauthorized withdrawal in the amount of \$2,678.00 from a Bank of America checking account in the name of A.L., account number xxxx0540; and attempted to negotiate and make an unauthorized withdrawal in the amount of \$1,250.00 from another Bank of America account in the name of A.L. During the course of the transactions and the attempted transaction, the illegitimate and fraudulent driver's license of A.L., containing means of identification specific to A.L., was presented and used in order to defraud Bank of America.

THE CONSPIRACY CHARGE

18. Beginning on or about sometime prior to April 1, 2014, with the exact date unknown to the Grand Jury, and continuing until on or about October 8, 2014, in the Eastern District of Missouri and elsewhere,

RODNEY TYLER and SCHARVON MAHONE a/k/a Scharvon Mahoney,

the defendants herein, and other persons known and unknown to the Grand Jury, did knowingly and willfully conspire, combine, confederate, and agree together and with other persons to commit an offenses against the United States, that is, bank fraud, in violation of Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Sections 1349 and 2.

The Grand Jury further charges that:

COUNT 2

19. The allegations contained in paragraphs 1-17 of Count 1 are incorporated by reference as if fully set forth herein.

20. On or about October 8, 2014, in the Eastern District of Missouri,

**RODNEY TYLER and
SCHARVON MAHONE a/k/a Scharvon Mahoney,**

the defendants herein, did knowingly execute and attempt to execute the aforesaid scheme and artifice to defraud and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of Bank of America, a financial institution, by means of materially false and fraudulent pretenses, representations, and promises, by presenting means of identification specific to A.L. to a bank teller at the Troy, Missouri branch of Bank of America in order to negotiate and make an unauthorized withdrawal in the amount of \$2,715.00 from a Bank of America savings account in the name of A.L., account number xxxx7716, without A.L.'s knowledge and consent.

In violation of Title 18, United States Code, Sections 1344 and 2.

The Grand Jury further charges that:

COUNT 3

21. Between on or about January 1, 2014 and on or about October 8, 2014, in the Eastern District of Missouri and elsewhere,

**RODNEY TYLER and
SCHARVON MAHONE a/k/a Scharvon Mahoney,**

the defendants herein, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, A.L., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(5), that is, conspiracy to commit bank fraud as charged in Count 1 of this indictment and bank fraud as charged in Count 2 of this indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

The Grand Jury further charges that:

COUNT 4

22. Between on or about January 1, 2014 and on or about October 8, 2014, in the Eastern District of Missouri and elsewhere,

RODNEY TYLER,

the defendant herein, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, A.S., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(5), that is, conspiracy to commit bank fraud as charged in Count 1 of this indictment and bank fraud as charged in Count 2 of this indictment.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461 and Title 18, United States Code, Section 982(a)(2)(A), upon conviction of an offense in violation of Title 18, United States Code, Section 1349, as set forth in Count 1, the defendant(s) shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds, traceable to such violation(s).

2. Pursuant to Title 18, United States Code, Sections 982(a)(2), upon conviction of an offense in violation of Title 18, United States Code, Section 1344 as set forth in Count 2, the defendant(s) shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained directly or indirectly, as a result of such violation.

3. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense(s).

4. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

CHARLES S. BIRMINGHAM, #47134MO
Assistant United States Attorney